

MICHAEL J. GARCIA
United States Attorney for the
Southern District of New York
By: KRISTIN L. VASSALLO
Assistant United States Attorney
86 Chambers Street
New York, New York 10007
Telephone: (212) 637-2822
Facsimile: (212) 637-2730

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAJKO LJUTICA,	:	
	:	Electronically Filed
Plaintiff,	:	
	:	
v.	:	07 Civ. 6129 (JSR)
	:	
ALBERTO R. GONZALES, U.S. Attorney	:	
General, MICHAEL CHERTOFF, Secretary,	:	
Department Homeland Security, EDUARDO	:	
AGUIRRE, Director, U.S. Citizenship and	:	
Immigration Services, ANDREA J.	:	
QUARANTILLO, Field Office Director, New	:	
York,	:	
	:	
Defendants.	:	
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DECLARATION OF KRISTIN L. VASSALLO

I, Kristin L. Vassallo, pursuant to 28 U.S.C. § 1746, make the following declaration under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Michael J. Garcia, United States Attorney for the Southern District of New York. I have been assigned to handle this case on behalf of defendants Alberto R. Gonzales, Attorney General, Michael Chertoff, Secretary of the Department of Homeland Security, Dr. Emilio T. Gonzalez, Director, United States Citizenship and

Immigration Services (“CIS”),¹ and Andrea J. Quarantillo, Field Office Director, New York, (collectively, “defendants”), and am fully familiar with all the facts stated herein. I respectfully submit this declaration to provide the following documents to the Court in connection with the defendants’ motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

2. Annexed hereto are true and correct copies of the following documents:

- Exhibit A: Ljutica’s Application for Permanent Residence, dated June 16, 1988
- Exhibit B: Memorandum of Creation of Record of Lawful Permanent Residence for Ljutica, dated November 9, 1998
- Exhibit C: Ljutica’s Joint Petition to Remove the Conditional Basis of Alien’s Permanent Resident Status, dated September 17, 1990
- Exhibit D: Notice of Removal of Conditional Basis of Lawful Permanent Residence for Ljutica, dated February 22, 1991
- Exhibit E: Certification of Criminal Disposition for United States v. Ljutica, 91-CR-1029-2 (SWK)
- Exhibit F: Indictment, United States v. Ljutica, 91 Cr. 1029 (SWK), filed December 23, 1991
- Exhibit G: Plea Agreement, United States v. Ljutica, 91 Cr. 1029 (SWK), dated May 20, 1993
- Exhibit H: Transcript of Plea, United States v. Ljutica, 91 Cr. 1029 (SWK), dated May 26, 1993
- Exhibit I: In the Matter of Rajko Ljutica, Order to Show Cause and Notice of Hearing, dated January 31, 1995

¹Eduardo Aguirre, originally named as a defendant in this lawsuit, is no longer the Director of CIS. Pursuant to Fed. R. Civ. P. 25(d), Dr. Emilio Gonzalez, the present Director, is automatically substituted for Mr. Aguirre as a defendant.

- Exhibit J: In the Matter of Rajko Ljutica, Order of the Immigration Judge, dated April 29, 1996
- Exhibit K: Ljutica's First Application for Naturalization, dated October 20, 1998
- Exhibit L: Decision on Application for Naturalization, dated October 9, 2001
- Exhibit M: Decision on Review of Denial of Naturalization Application, dated October 18, 2002
- Exhibit N: Ljutica's Second Application for Naturalization, dated March 14, 2005
- Exhibit O: Notice of Action, dated September 22, 2005
- Exhibit P: Naturalization Interview Results for Ljutica, dated November 16, 2005
- Exhibit Q: Decision on Application for Naturalization, dated September 18, 2006
- Exhibit R: Request for a Hearing on a Decision in Naturalization Proceedings, enclosing Brief on Appeal, dated October 11, 2006
- Exhibit S: Decision on Review of Denial of Naturalization Application, dated March 9, 2007

Dated: New York, New York
September 17, 2007



KRISTIN L. VASSALLO